NOTES OF CASES.

BICYCLES.—The reasonableness of an ordinance prohibiting a person to ride a bicycle with handle-bars more than four inches below the top of the saddle is held, in *Moore* v. *District of Columbia* (D. C.), 41 L. R. A. 208, to be a question of fact to be determined by evidence.

TRAFFIC ASSOCIATIONS.—In *United States* v. *Joint Traffic Association*, 19 Sup. Ct. 25, the United States Supreme Court reaffirms the doctrine of *U. S.* v. *Trans-Missouri Frt. Ass'n*, 166 U. S. 290. The original decision was reviewed at length by Wm. L. Royall, Esq., in 3 Va. Law Reg. 163, 241.

BANKRUPT LAW.—In *Parmenter, etc. Co.* v. *Hamilton*, 51 N. E. 529, the Supreme Court of Massachusetts holds that the United States Bankrupt Law of July 1, 1898, supersedes all State insolvent laws from the date of its passage—save where proceedings had already been commenced.

JUDGMENT LIENS.—The power of a court on setting aside a mere money judgment, to continue the lien thereof, so that it may attach to such judgment as may be subsequently rendered, is denied in *Farmers' Loan & T. Co.* v. *Killinger* (Neb.), 41 L. R. A. 222. With this case is a review of the other decisions on this question.

MORTGAGES—REGISTRY.—A mortgagee of chattels, who takes actual possession before any other lien attaches, has a good title although the mortgage be not recorded. *Prout* v. *Barlow* (Minn.), 76 N. W. 946. See also Jones on Chattel Mortgages, 178, 245; Jones on Pledges, 38; *Clark* v. *Ward*, 12 Gratt. 440.

ANIMALS FERÆ NATURÆ.—Where a sea lion escapes from its owner, and is afterwards caught in the open sea, seventy miles away, the original owner cannot reclaim it from the captor, in the absence of proof of the *animus revertendi*, although it may not have reached its native waters nor waters favorable for its continued existence. *Mullett* v. *Bradley*, 53 N. Y. Supp. 781.

ANIMALS—INCREASE.—In *Northwestern, etc. Bank* v. *Freeman*, 19 Sup. Ct. 36, the United States Supreme Court decides that where there is a mortgage upon domestic animals, the lien of the mortgage attaches to their increase, though not so provided in the contract. *Cattle Co.* v. *Mann*, 130 U. S. 69; *Pyeatt* v. *Powell*, 10 U. S. App. 200, 2 C. C. A. 367, and 51 Fed. 551.

INJUNCTIONS—NUISANCES.—An injunction against keeping a bawdy house on certain premises is denied in *Neaf* v. *Palmer* (Ky.), 41 L. R. A. 219, although it is obnoxious to the neighborhood and unfavorably affects the salable value of property in the locality.

An injunction by a city against a nuisance affecting the comfort and convenience of the public is held proper in *Red Wing* v. *Guptil* (Minn.), 41 L. R. A. 321, although the nuisance is not injurious to the public health. With this case is a